

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**POINT BRIDGE CAPITAL, LLC,
HAL LAMBERT**

Plaintiffs,

v.

CHARLES JOHNSON,

Defendant.

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Civil Action No. 4:24-cv-00988-P

PLAINTIFFS' WITNESS LIST

Pursuant to the Court's July 3, 2025 pretrial order, (ECF No. 76), Plaintiffs' Point Bridge Capital, LLC and Hal Lambert ("Plaintiffs"), submit the following witness list.

Probable Witnesses	Brief Narrative Summary	Sworn	Testified
Hal Lambert c/o Will Thompson 1900 N. Pearl Street Dallas, TX 75201	<p>Hal Lambert will testify about the personal and professional harm he suffered as a result of Charles Johnson's campaign of defamation, threats, and retaliation. He will explain how Johnson initially approached him under the guise of business collaboration and government access, but quickly turned to coercive tactics—demanding equity, influence, or control under threat of reputational and regulatory harm when Lambert did not comply with Johnson's demands. Lambert will describe how Johnson falsely portrayed him as a corrupt investor, a national security risk, and a participant in misconduct, while Johnson claimed to be acting on behalf of federal agencies.</p> <p>Lambert will offer lay opinion testimony under Rule 701 that Johnson's attacks severely damaged his credibility with investors, led to a significant and measurable drop in earned media value, and caused a decline in capital flowing into Point Bridge's investment funds, which necessitates paying for reputation rehabilitation. Lambert will explain that his business is built on his personal reputation and public visibility—particularly in national television appearances—and that Johnson's defamatory statements directly undermined both. He will also testify to the emotional toll of having to explain vile and baseless accusations to his daughters, and the broader damage to his family, reputation, and professional standing.</p> <p>Mr. Lambert has <u>not</u> been deposed.</p> <p>Plaintiffs anticipate that his direct testimony will take 120 minutes.</p>		

Charles Johnson Address Unknown	<p>Plaintiffs anticipate questioning Johnson about his communications with Hal Lambert and others, including messages, emails, and social media posts in which he made serious allegations about Lambert and Point Bridge. Plaintiffs anticipate to question him about his claims of affiliation with U.S. government agencies, including the FBI and CIA, and his representations to others that he had influence over federal investigations or contracting decisions. Plaintiffs also anticipate to question him about his public and private statements concerning national security, foreign affiliations, sexual misconduct, and alleged improprieties by Lambert. In addition, Plaintiffs anticipate to question him about his financial interests, motivations, and any efforts he undertook to obtain money, equity, or business leverage through threats or coercion. Johnson will further be questioned regarding the damages his conduct caused to Plaintiffs' reputation, media exposure, and business relationships. Plaintiffs also anticipate to examine him on the issue of intent when undertaking his blackmail scheme. Plaintiffs anticipate questioning Johnson on issues relating to the punitive damages factors in</p> <p>Johnson has <u>not</u> been deposed.</p> <p>Plaintiffs anticipate questioning Johnson for 100-120 minutes.</p>		
Witness Name: (EXPERTS)	Brief Narrative Summary	Sworn	Testified
Dennis Brady c/o Will Thompson 1900 N. Pearl Street Dallas, TX 75201	<p>Dennis Brady will testify as an expert in federal criminal investigations and informant oversight. He will explain that Charles Johnson engaged in a deliberate, multi-year campaign of reputational and economic coercion against Hal Lambert and Point Bridge. Brady will testify that Johnson falsely portrayed himself as a federal operative and confidential human source (CHS) to gain leverage, using threats of government retaliation and promises of access to influence business outcomes. Drawing on decades of experience in the FBI, Brady will state that Johnson's conduct mirrors schemes involving informant misuse, wire fraud, extortion, and reputational shakedowns. He will further explain that Johnson's portrayal of himself as a CHS was inconsistent with FBI policy, violated multiple CHS restrictions and standards, and was consistent with patterns of conduct that have led to criminal prosecutions for fraud and extortion and similar criminal investigations in which he has been involved.</p> <p>Mr. Brady has <u>not</u> been deposed.</p> <p>Plaintiffs anticipate that his direct testimony will take 50 minutes.</p>		
Stewart Baker c/o Will Thompson 1900 N. Pearl Street Dallas, TX 75201	<p>Stewart Baker will testify as an expert in national security, federal procurement, and government contracting. Drawing on decades of experience at the NSA, DHS, and in private practice advising technology-sector clients, Baker will explain how false claims of intelligence ties—especially when paired with reputational threats—can be uniquely coercive in the national security ecosystem. He will testify that Charles Johnson's conduct, as alleged, mirrors known schemes in which fraudsters falsely invoke federal authority to exert leverage over companies and investors involved in government contracting. Baker will explain that it was entirely reasonable for Hal Lambert and Point Bridge to view Johnson's threats as credible, given the opacity of federal procurement processes and the severe consequences even unproven allegations can have in sensitive contracting environments. His testimony will show that Johnson's tactics exploited real-world national security vulnerabilities and were consistent with conduct that</p>		

	<p>has triggered government investigations and criminal prosecutions in other contexts.</p> <p>Mr. Baker has <u>not</u> been deposed.</p> <p>Plaintiffs anticipate that his direct testimony will take 50 minutes.</p> <p>Plaintiffs have requested that Mr. Baker testify remotely due to complications from a heart procedure.</p>		
<p>Larry Chiagouris, Ph.D.</p> <p>c/o Will Thompson 1900 N. Pearl Street Dallas, TX 75201</p>	<p>Dr. Larry Chiagouris will testify as an expert in marketing, branding, and reputational harm. He will explain that Hal Lambert's visibility and credibility in the media are integral to Lambert's personal success and the success of Point Bridge Capital, which relies heavily on Lambert's public profile to attract investors and business opportunities. Dr. Chiagouris will about the sharp decline in media exposure and publicity value following Charles Johnson's defamatory campaign. He will state that the drop is reputationally significant, not attributable to market forces or a loss of interest, and that Lambert's interest and availability for media appearances remained steady. Dr. Chiagouris will further testify that the damages figures provided by Lambert are reasonable and consistent with losses experienced by similarly situated individuals whose reputations are undermined in the public domain. Dr. Chiagouris is expected to testify about the relevance of professional services to rehabilitate Plaintiffs' reputation and branding.</p> <p>Dr. Chiagouris has <u>not</u> been deposed.</p> <p>Plaintiffs anticipate that his direct testimony will take 70 minutes</p>		

Dated : July 10, 2025

Respectfully submitted,

/s/ Will Thompson

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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 10, 2025, he or someone on his behalf served this document served via the Court's ECF system and emailed to the defendant at the following email addresses:

Charlescjohanson88@gmail.com

/s/ Will Thompson

Will Thompson